Docket	:	A.12-02-014
Exhibit Number	:	DRA-5
Commissioner	:	Florio
ALJ	:	Long
Witness	:	Tolbert

DIVISION OF RATEPAYER ADVOCATES
CALIFORNIA PUBLIC UTILITIES COMMISSION

Report on the Results of Operations for California Pacific Electric Company General Rate Case Test Year 2013

Customer Accounts, Customer Service & Information Expenses

San Francisco, California
July 27, 2012

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CUSTOMER ACCOUNTS, CUSTOMER SERVICE AND INFORMATION EXPENSES

I. INTRODUCTION

This Division of Ratepayer Advocates (DRA) Report presents our analyses and recommendations regarding the following cost accounts: Customer Accounts and Customer Service and Information. According to Application (A.) 12-02-014 filed on March 16, 2012, the California Pacific Electric Co. (CalPeco) seeks recovery of these accounts over the three-year rate cycle beginning in Test Year (TY) 2013.

CalPeco serves approximately 49,000 electric customers in California, who are located in and around the Lake Tahoe Basin and in portions of the California counties: Placer, El Dorado, Nevada, Sierra, Plumas, Mono and Alpine. The elevations in CalPeco's service territories range from 9,050 feet in Squaw Valley to 5,000 feet in Portola, which experience a winter peaking-load. The City of South Lake Tahoe has the highest number of ratepayers.

Residential customers account for about half of CalPeco's demand, and 60% of these accounts are second-family homes or rentals. CalPeco service territories have little manufacturing or heavy industry activities but mostly consist of businesses serving tourism, such as hotels, motels, and ski resorts.

II. SUMMARY OF RECOMMENDATIONS

DRA's summary of recommendations in this Report pertains to CalPeco's Exhibit 4. The Customer Accounts expenses are recorded to FERC Accounts 901 to 905. The Customer Service and Information expenses are recorded to FERC Accounts 907 to 910. DRA reviewed the reasonableness and justification of the program expenditures made during the period 2009 through 2011 and CalPeco's forecasts for these expenses, including CalPeco's Energy Efficiency Program costs recorded to FERC Account 908.

DRA's recommendations are as follows:

- CalPeco's 2011 Base Year Energy Efficiency Program budget proposed for 2013 should be reduced by $70,402 , i.e., from the 2011 budgeted expenditure of $400,000 to $329,598 for TY 2013.
- $26,400 of overspending in CalPeco's Energy Education budget should be allocated to its portfolio of directly measurable Energy Efficiency programs.
- The Commission should disallow CalPeco's request to spend $18,000 on its proposed pilot Weatherization Program.
- The 2011 carryover in the amount of $5,108 should be credited to ratepayers in TY 2013 or amortized.

DRA Tables 5-1 and DRA 5-2 below compare DRA's and CalPeco's TY 2013 respective forecasts of expenses for Energy Efficiency Programs, Customer Accounts, and Customer Service & Information.

Comparison Tables DRA 5-1 and DRA 5-2 are of Customer Accounts, and Customer Service and Information Expenses that inclusive of Energy Efficiency Programs for TY 2013

(In Thousands of 2011 Base Year Dollars)

DRA 5 - 1					
	Customer Accounts Expenses for TY 2013 (In Thousands of 2011 Dollars)				
FERC Acct No.	Discription	DRA	CalPeco	Difference	CaPeco >DRA
901	Supervision	106	106	-	0.0%
902	Meter Reading Expense	815	815	-	0.0%
903	Customer Records & Collection Expense	33	33	-	0.0%
904	Uncollectible Accounts Expense	280	280	-	0.0%
905	Misc. Customer Accounting Expense	11	11	-	0.0%
	Total Customer Accounts Expense	$ 1,245	$ 1,245	$ -	0.0%

DRA 5 - 2					
	Customer Service and Information Expenses for TY 2013 (In Thousands of 2011 Dollars)				
FERC ACCT NO	Discription	DRA	CalPeco	Difference	CaPeco >DRA
907	Supervision	196	196	-	0.0%
908	Customer Assistance	452	522	70.4	13.5%
909	Advertising	38	38	-	0.0%
910	Miscellaneous	66	66	-	0.0%
	Total Customer Service & Information Expense	$ 751.6	$ 823	$ 70.4	8.6%
	Total Cust. Accts & Cust. Service & Information	$ 1,996.6	$ 2,068	$ 70.4	3.4%

CalPECO data from WP. P.11 OF 265

III. DRA's ANALYSIS

A. Allocation Method

DRA's recommendations are made up of two parts; a $68,700 reduction to expenses and a $5,106 credit to ratepayers amortized over three years. These adjustments represent a total of $70,402 reductions for each of three years. DRA reallocated the funding from the Education Program and the Pilot Weatherization Program to measureable program activities. DRA distributed this adjustment based on CalPeco's own TY 2013 funding priorities once the two items are removed. This method results in DRA's recommended budget amount of $329,598 in the TY.

B. Customer Accounts

DRA reviewed CalPeco's forecast of Customer Accounts costs of $1.245 million for TY 2013. DRA does not take issue with CalPeco's TY 2013 expense forecasts for FERC Accounts 901 – 905 based on DRA's field investigation of the reopened facility and regression analysis of Sierra Pacific's 2003 – 2009 cost data from the 2009 General Rate Case (GRC).

C. Customer Service and Information

DRA has reviewed CalPeco's Customer Service and Information forecast costs of $2.068 million for TY 2013. CalPeco initiated a number of significant customer service changes, including the following:[1]

- Reopening of the walk-in customer service center in South Lake Tahoe;
- Enhancing storm communication protocols, such as providing media and local governmental leaders with periodic updates, to provide customers with the most current information available regarding the status of outages and the schedules for restoring service; and
- Participating in Community Outreach programs, including comprehensive and focused participation in community events in which CalPeco's representatives can communicate face-to-face with customers about energy efficiency programs.

DRA has reviewed these costs and finds it difficult to distinguish between CalPeco's participation in community events and their public relations activities in 2011.

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[1] CalPeco Vol. 1, Application, p. 11.

CalPeco admits to overspending its Energy Education budget by 360.2% and that these one-time expenditures will no longer be needed. While probably well intentioned, CalPeco's public relations efforts had no observable benefit on energy savings or its ability to meet its targets. DRA finds that CalPeco's actions were inconsistent with its own budget with regards to the $95,097 spent-over budget in 2011.

DRA notes that $26,400 of CalPeco's overspending was to be used for its Energy Education Program but was not. DRA recommends using these funds to inform CalPeco's customers of programs which show directly measurable savings. DRA recommends reallocating the $26,400 to CalPeco's Energy Efficiency Programs in TY 2013.

D. Energy Efficiency Program

CalPeco proposes a $400,000 budget for its TY 2013 Energy Efficiency programs. DRA recommends $329,598 as the more reasonable spending level for CalPeco's TY 2013 Energy Efficiency program budget. CalPeco appears to be experimenting with its Energy Efficiency Programs and has not developed a definitive, direction for its program. DRA's recommendations and comparisons are delineated in Table DRA 5 – 3 below:

Table DRA 5 – 3

Comparison of Energy Efficiency Program for TY 2013
(In Thousands of 2011 Dollars)

2013 Energy Efficiency	2013 Budget	DRA 2013 Recommendation	CalPECO> DRA	% over DRA
	(a)	(b)	c=(a - b)	d=c/b)
Energy Education	26,400	-	26,400	100.0%
Residential & Commercial Energy Audits	86,400	$ 80,172	6,228	7.8%
Energy Star Lighting	96,400	$ 89,452	6,948	7.8%
Refrigerator Recycling & Rebate	20,000	$ 18,558	1,442	7.8%
Commercial Incentive Program	95,000	$ 88,153	6,847	7.8%
Public Schools Incentive Program	57,400	$ 53,263	4,137	7.8%
Weatherization Pilot Program	18,400	-	18,400	100.0%
Total Expenditures	**$ 400,000**	**$ 329,598**	**$ 70,402**	**21.4%**

DRA investigated and reviewed current California energy efficiency policies; Commission Decisions; various energy efficiency reports; the Liberty Energy 2011 program year report; phone discussions with CalPeco contractors; and a field investigation in CalPeco's service territory. DRA observed CalPeco's practices which were used to develop its recommendations. DRA carefully reviewed the Commission's GRC TY 2009 Sierra Pacific settlement decision (D.09-10-041) regarding reductions in Energy Efficiency Programs and its recommendations to return carryover funds to ratepayers. Table DRA 5 – 3 is the result of DRA's review of CalPeco's data responses and information provided.

In Sierra Pacific's 2009 GRC, DRA recommended that the Energy Educator Program not be funded stating, "no evidence [shows] that this program will benefit California customers."[2] In 2011, the Energy Efficiency Program overspent the Energy Education specific program budget by 360.2%, i.e., spending $95,097 in excess of the budgeted target of $26,400.

CalPeco did not meet its energy efficiency customer contact targets of 2,730 customers or its 250 student contact targets after significantly overspending its budget. Nor did CalPeco meet its overall energy savings target of 2,890 MWh, achieving 1,899.5/MWh in overall energy savings. This raises questions whether CalPeco can execute an effective strategy for the success of its existing energy efficiency programs in a cost-effective manner. CalPeco has not shown that expanding its Energy Efficiency Program portfolio would produce more productive results. DRA recommends tying Energy Education to CalPeco's measured energy efficiency programs which may produce a more efficient and focused Energy Efficiency Program.

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[2] *See CalPeco,* A.08-08-004, DRA Report re O&M Expenses – Customer Accounts and Energy Efficiency Program at p. 5.

E. Carryovers

In the last Sierra Pacific 2009 GRC, DRA noted that CalPeco had not been able to spend its carryover funds amounting to $355,334 through the end of 2008, as shown in Table DRA 5-4 below.

Table DRA 5 - 4

CalPeco's Energy Efficiency Fund Carryover	
Energy Efficiency Programs	**Total**
Energy Education (Home Shows and Audits)	$ 7,712
Energy Educator	141,130
Residential Rebates Program	56,372
Energy Star Rebate Program	52,551
Refrigerator Recycling Component	67,588
Water Heater Blanket and Showerhead Program	12,563
Sure Bet Program	17,418
Total Carryover to 2008	**$ 355,334**

In spite of its budget reduction in the prior GRC, Sierra Pacific spent only $232,304 of the 2008 carryover funds, leaving a balance of unspent carryover funds of $123,029 at the end of 2008. The 2009 revenue requirement budgeted $400,000, plus the carryover of $123,029, required a level of spending of $523,029 to balance for 2009. Sierra Pacific spent $503,395 the following year, leaving a carryover in 2010 of $19,634. In 2010, Sierra budgeted $419,634 and spent $433,500, above the amount needed to clear the prior year's carryover.

In spite of the extra spending, "Sierra's energy efficiency programs achieved 70.9% of the 2009 energy savings goals based on the General Rate Case A.08-08-004. This Report discusses performance and proposes changes to the delivery processes or alternative strategies that would improve program delivery in 2010. In the development of Sierra's 2010 energy efficiency program Sierra incorporated the dollars not spent in 2009 into the 2010 budget."[3]

CalPeco's 2011 Energy Efficiency Report[4] shows that the budget target for 2011 was not met. In fact, there was significant non-repeating one-time discretionary overspending of $68,697 in 2011. According to the Report:

> [W]hile important to the long-term program results, these efforts and associated expenses did not produce energy savings for the programs. The Commercial Incentive Program incurred expenses to recruit an implementation contractor that ultimately did not prove out. This program also provided technical services and audits to commercial customers who ultimately chose not to implement energy saving measures; this resulted in lower energy saving to the overall program.[5]

CalPeco spent $394,892 in 2011 for its Energy Efficiency programs; the Commission authorized $400,000 in rates, so a carryover of $5,108 remained. The proposed spending at the $400,000 level will not likely improve CalPeco's Energy Savings rate or add efficiencies to its program. DRA recommends the 2011 carryover of $5,108 be credited to ratepayers, and that the one-time spending above the $26,400 Education Program budget not be allowed going forward, which amounts to $68,697.

It is CalPeco's burden to show that it has spent the Commission authorized revenues each year to meet their goals. CalPeco has not done so for 2011. DRA believes that all the amounts of $68,697 and $5,108 are not justified for future spending. CalPeco should integrate its requested $26,400 Education Program budget into their other direct programs where effectiveness and efficiencies are better measured.

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[3] Sierra Pacific's California Energy Efficiency Report for 2009 – p. 4.

[4] CalPeco's 2011 Energy Efficiency Report is included as Attachment 1 to this exhibit.

[5] CalPeco 2011 Energy Efficiency Report, Table B – 1, p. 5.

F. Energy Efficiency Program Costs & Performance

DRA finds CalPeco's Energy Education cost to be excessive. CalPeco agrees that it over-spent its Energy Education budget in 2011, stating:

> The Energy Education program over-spent the specific program budget with expenditures totaling 360.2%. This included expenditures of $95,097 of the $26,400 target budget. The program was successful in delivering energy education and information to over 2,700 customers at Community Events [this was not a goal of the 2011 budget]. The program did not specifically provide training to 250 students in the schools.[6]

Because of the nature of CalPeco's spending in this area, its energy savings is undetermined. CalPeco was nearly 1,000 MWh below their target of 2,890/MWh for the year[7], showing the overspending provided no added value to the overall energy savings. Table DRA 5-5 shows CalPeco's 2011 energy savings for its Energy Efficiency portfolio.

DRA 5 – 5

2011 Energy Savings Targets and Actual

Programs	Targeted	Actual	Difference	% of Target
Energy Star Lighting Program	1400 MWh	1122.5 MWh	277.5 MWh	80.2%
Refrigerator Recycling	280 MWh	61.0 MWh	219.0 MWh	21.8%
Commercial Incentive Program	990 MWh	617.8 MWh	372.2 MWh	62.4%
Public Schools Incentive Program	220 MWh	98.2 MWh	121.8 MWh	44.6%
Total	**2890 MWh**	**1899.5 MWh**	**990.5 MWh**	65.7%

CalPeco's 2011 Energy Efficiency Report p.6

CalPeco exceeded the budget for this Program due to the expenses incurred in getting the equipment and materials necessary to initiate this and other integrated programs, such as acquiring a booth, purchasing banners, printing materials, and

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[6] CalPeco's Energy Efficiency 2011 Report, p. 12.

[7] CalPeco's Energy Efficiency 2011 Report p. 6, Table B – 2.

providing energy education samples to use in the education process. According to CalPeco, "[t]hese were one-time expenses and should not be expected to repeat in future years."[8]

CalPeco plans to re-launch the School Energy Education Presentation Program in public schools for all levels of students. It abandoned $26,400 budgeted for this program in 2011 and instead launched a public relations (community events) campaign to brand-advertise Liberty Energy. This campaign spent 360.2% of the Energy Education budget and made *no* contacts in the targeted area. It appears that $95,097 of CalPeco's budget was spent in ways unintended by their own budget. Neither the Energy Education Program nor the community events efforts were successful and appear to be focused on advertising for Liberty Energy. The $95,097 one-time expenditure did not assist CalPeco in achieving its energy savings target, meeting only 65.7% of their overall goal for 2011.

As stated above, DRA objects to the Energy Education Program as unreasonable and unjustified. The data available to DRA show that the Program is inefficient and does not achieve its overall MWh savings targets. DRA recommends a Base Year adjustment of $95,097 in 'one-time' expenditures up to a total of $304,903, which would represent a reasonable budgeted program spending for 2011.

DRA agrees with CalPeco's decision to maintain $26,400 spending in the Energy Education Program for TY 2013. However, we recommend a more efficient allocation of those funds. DRA believes that the Energy Education Program should not be used to develop curricula for schools in CalPeco's service territory. Instead, the Program should constitute a direct subset of each program effort in CalPeco's Energy Efficiency portfolio and treated as such. Therefore, DRA is recommending an additional $26,400 be

[8] Attachment 1, CalPeco Energy Efficiency 2011 Report, p. 12.

allocated to those direct programs in CalPeco's Energy Efficiency portfolio where benefits can be measured.

CalPeco has stated their intent to "launch a School Energy Education Presentation Program to enhance curriculums for all levels of students and deliver energy efficiency education through the schools."[9] Schools have their own budgets for developing educational curricula. School curriculum development is not a part CalPeco's Energy Efficiency mandate. Therefore, ratepayers should not fund such endeavors. CalPeco has not shown that developing an energy efficiency curriculum for all schools is reasonable and justified.

G. Residential & Commercial Energy Audit Program

CalPeco proposes to merge the Residential and Commercial Energy Audit Programs[10] and their budgets. In 2011, the combined spending for these Programs was $86,400. For TY 2013, DRA recommends funding of $80,172 , as explained below.

CalPeco's three year energy efficiency cycle will require less in both residential and commercial audits overtime. Efficiency gains will offset another portion of this adjustment (about $1,650 per year at 2.0%). With the California compact fluorescent light (CFL) markets becoming saturated, it appears unreasonable and unjustified for CalPeco to spend the proposed amount on CFL programs.

CalPeco should shift its efforts to other energy efficiency saving programs. For example, advanced lighting programs based on rapidly emerging technologies, such as Light Emission Diodes (LEDs), should be explored. As of January 1, 2011, light bulb manufacturers are required to meet new efficiency standards in California to save

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[9] CalPeco Vol. 3, Exh. 4, p. 2 – 8, lines 10 – 12.

[10] CalPeco Vol. 3, Exh. 4, p. 2 – 12 and p. 2 – 4, Energy Efficiency budget table note.

consumers' money and energy. The standard, passed by Congress and signed by President George W. Bush, became effective January 1, 2012, states as follows:

> California enacted the federal standards one year earlier to avoid the sale of 10.5 million inefficient 100-watt bulbs in 2011 which would cost consumers $35.6 million in unnecessarily higher electricity bills. By reducing energy consumption the standard will reduce air pollution from the burning of fossil fuels in power plants while producing the same quality of light as traditional incandescent bulbs."[11]

Enacted State and Federal policies allow the market to work, and consumers to make energy saving economic choices, regarding many of their energy efficiency needs. In this changed market, CalPeco could directly market a prescribed list of energy efficiency measures to small commercial customers and provide technical assistance, which appears to offer alternatives to its present programs.

DRA concludes that an $80,172 spending level in TY 2013 for these two programs is sufficient, and with efficiencies gained it should produce more productive programs going forward. Given that 60% of CalPeco's customers are second homes or rentals, residential audits should be provided on a pay-for-service basis. According to DRA's information, most if not all major IOU's no longer provide free residential audits. CalPeco has not justified doing so. Further, the new State and Federal rules discussed above, no longer justify distributing free CFL light bulbs of 100 watts or less, which did not meet CalPeco's Energy Savings Target in 2011.

H. Energy Star Lighting Program

The Energy Star Program provides CFL bulbs to customers in CalPeco's service territory. CalPeco distributes the CFLs at public relations events as well as residential and commercial audits. Beginning January 1, 2012 CFLs of less than 100-watt will be the only ones available on retail shelves. CalPeco gave away 21,862 bulbs in 2011,

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[11] http://www.energy.ca.gov/lightbulbs/lightbulb_faqs.html

nearly one for every two people in its service territory.[12] This program, however, did not meet CalPeco's Energy Savings Target in 2011. DRA's recommends Energy Star Lighting spending at the $89,452 expense level for TY 2013.

Under current State and Federal rules, incandescent bulbs 100 watts or less are mostly no longer available. The diminishing sales of incandescent light bulbs in California consequently increases the number of CFLs given away but which would have been purchased by customers anyway, as acknowledged by CalPeco as follows:

> The dwindling interest in the standard 60-watt replacement CFLs [is] . . . evidenced by the number of customers who refused free 60-watt standard replacements at both events and during audits.[13]

DRA therefore recommends that this program be funded at a reduced spending level of $89,452 in TY 2013.

I. Refrigerator Recycling & Rebate Program

CalPeco seeks $20,000 for its Refrigerator/Freezer Recycling & Rebate Program (Recycling Program). DRA recommends $18,558 for this program in TY 2013. The Recycling Program allows customers to reduce energy consumption by removing functional inefficient units to save energy. It offers customers a rebate of $35 with removal of the old units. CalPeco removed 78 units during 2011, far below its target of 220 units for the year. Although the program was advertised multiple times in CalPeco's bill-insert and by contractors in a variety of communications media, CalPeco does not believe that increasing its marketing efforts will increase the number of recycled units.[14] CalPeco explains the poor performance of this program in 2011 as being weather related, which was unusually cold during the last 6 months of 2011.

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[12] CalPeco's 2011 Energy Efficiency Report, p. 20.

[13] CalPeco 2011 Energy Efficiency Report, p. 19.

[14] CalPeco Vol. 3, Exh. 4, p. 2 – 16. Lines 6 – 15.

Refrigerator/freezers recycling programs are no longer as effective as they once were. With each new generation of refrigerator/freezers becoming more and more energy efficient, the marginal saving per-unit decreases. For instance, units purchased and recycled after 1992 yield on-average less energy savings than those recycled before that time. This is due to legislation increasing the energy efficiency standards and requiring production of more efficient products. Also, because 60% of CalPeco's residential customers are renters or second-homeowners, they do not appear as likely to recycle their units as permanent residents would be. DRA recommends that CalPeco's recycling program be funded at $18,558 . This program did not meet CalPeco's Energy Savings Target in 2011.

J. Commercial Incentive Program

CalPeco is requesting $95,000 for its Commercial Incentives Program. DRA recommends $88,153 for TY 2013. Although CalPeco's program did not reach its energy savings goal of 990 MWh in 2011, it did achieve 617.8 MWhs in savings. This Program achieved approximately 62.4% of its target which represents 32.5% of CalPeco's total energy savings for 2011.

This Program may have potential and DRA recommends funding it in the amount of $88,153, which is reasonably sufficient to enable CalPeco to attain its goals. According to CalPeco:

> The program required little marketing and the budget was expended with only a few calls to public agencies and by incoming calls from commercial customers looking for incentives for energy efficiency upgrades…No marketing is expected to be necessary to capture commercial energy saving projects as the knowledge and interest in the program seems to be growing by word of mouth through agencies, suppliers, and contractors.[15]

[15] CalPeco 2011 Energy Efficiency Report, p. 26.

K. Public Schools Incentive Program

CalPeco is requesting $57,400 in TY 2013 for its Public Schools Incentive Program; DRA recommends $53,263 . CalPeco's program did not reach its energy savings goal of 220/MWh in 2011 as it was within 44.6% of that target. According to CalPeco, this Program's performance would have been better, but they completed it late in the year. Based on the above discussion, this Program may have potential, and DRA recommends a funding level close to CalPeco's requested amount.

In field investigation of CalPeco South Lake Tahoe service area, DRA visited and discussed a number of school projects. According to CalPeco's Energy Efficiency Report:

> Tahoe Truckee Unified School District worked on two projects in 2011. The first project installed computer power management software in 271 computers within the CalPeco territory. The software identifies computers that are not in use and curtails their energy use by shutting them down saving an estimated $10 - $50 per day per unit.[16]

In one instance, DRA observed that a school had installed with CalPeco's assistance solar lighting in parking structures. Other schools demonstrated a LED upgrade of outdoor lighting at four separate facilities spending $8,187. These examples show some projects that can result in energy savings. Though DRA is recommending funding this Program at $53,263 , which is less than CalPeco's request of $57,400, DRA's amount is 40.01% higher than CalPeco's actual 2011 expenditures of $38,020.[17]

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[16] CalPeco 2011 Energy Efficiency Report, p. 28.

[17] CalPeco Vol. 3, Exh. 4, p. 2 – 4.

L. Weatherization Pilot Program

CalPeco proposes to pilot a Weatherization Program and other heat retaining measures in residential units whose primary heating source is electricity.[18] DRA opposes this Weatherization Program for three primary reasons. First, CalPeco does not have a well-developed and successful Energy Efficiency portfolio of programs, such as the Energy Education Program in 2011 which produced no energy savings. Second, CalPeco is new to California and has not shown that it is able to set or reach its current energy-saving targets. Third, CalPeco has not shown that such a pilot Program is reasonable and justified in a highly transient population. CalPeco is spending money but has not yet produced an effective approach to energy efficiency in this new environment.

CalPeco should not be authorized to add a new program to its Energy Efficiency Portfolio at this time. Instead, CalPeco needs to show a record of achieving its energy saving targets higher than only 66.0%. Improving efficiencies in their portfolio performance of current programs would more effectively increase energy savings.

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[18] CalPeco Vol. 3, Exh. 4, Ch. 2, p. 2-20.

IV. Qualifications of Witness

Q.1 Please state your name and business address.

A.1 My name is Dr. Joel Tolbert. My business address is 505 Van Ness Avenue, San Francisco, California, 94102.

Q.2 By whom are you employed and in what capacity?

A.2 I am employed by the California Public Utilities Commission as a retired annuitant in the Division of Ratepayers Advocates Energy Cost of Service and Natural Gas Branch.

Q.3 Briefly describe your educational background and work experience.

A.3 I received a Bachelor of Science Degree in Statistics and a Bachelor of Arts Degree in Economics from California State University Hayward, and a Doctorate of Philosophy in Management from Columbia Commonwealth University in Wyoming.

I have over 45 years in both public and private industries, the most recent 30 years were at the Public Utilities Commission as a Regulatory Analyst in the Division of Ratepayer Advocates. I have worked on numerous Energy, Telecommunication and Public Purpose Programs cases including: GRCs, Energy Resource Recovery Act (ERRA) proceedings, Advice Letters, OIIs and OIRs.

Q.4 What is the purpose of your testimony?

A.4 I am responsible for Exhibit DRA-5, Customer Accounts and Customer Service & Information Expenses.

Q.5 Does that complete your prepared testimony?

A.5 Yes, it does.

V. Attachment 1: CalPeco Annual Energy Efficiency Report (2012)